

REMARKS

Claims 1-42 are pending in the application. Claims 1-10, 12-32, and 34-42 stand rejected. Claim 11 and 33 are objected to by the Examiner. It is unknown whether the drawings have been accepted or rejected as the Examiner did not mark a box. The Examiner's objections and rejections are addressed below in substantially the same order as in the office action.

CLAIM OBJECTIONS

Claim 1 was objected to because of informality. Claim 1 has been amended to correct the noted error.

REJECTIONS UNDER 35 USC § 102

Claims 1-10, 12-14, 16-32, 34-42 stand rejected under 35 U.S.C. 102 as being anticipated by US patent 6,772,840 to Headworth.

The Examiner rejected Claims 1-9, 12-14, 16-32, and 34-42 as being anticipated by US patent 6,772,840 to Headworth. The Examiner contends that Headworth discloses a system and associated flow assurance method for injecting one or more additives into production fluid produced by at least one subsea well. The Examiner specifically contends that the Headworth system has a subsea chemical injection unit at the selected subsea location that pumps the chemical into the production fluid.

As Applicant has argued previously, the pipe 70 of Headworth is part of a subsea tie back system that is conveyed along the flow bore of a flowline 50. Col. 11, lines 10-12. The pipe 70 is merely a flow conduit does not actively pump chemicals into the production fluid. Rather, to Applicant's reading, the pipe 70 is a conduit for chemicals pumped from the surface by a surface pump. Applicant believes that the specification to the instant application clearly describes a "chemical injection unit" as a device that actively pumps a chemical into the

production. Applicant has amended the independent claims to further clarified that a subsea pump pumps the chemical into the production fluid. Headworth clearly does not disclose a subsea chemical injection unit and pump as recited by the independent claims. For convenience, Figure 2 of Headworth is reproduced below:

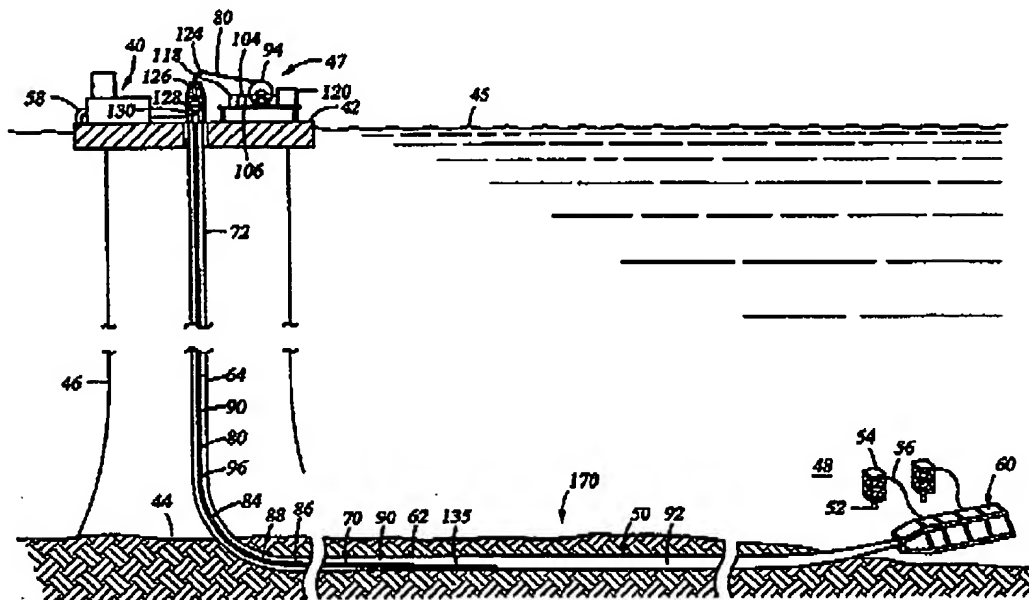


Fig. 2

As can be seen, Headworth does not show a subsea pump. Nor can a subsea pump be used in the Headworth design because the injection tubular 70 is disposed inside the flow line.

As clarified, claims 1, 30 and 36 recites a subsea chemical injection unit at the selected subsea location receiving the at least one chemical from the surface chemical supply unit and selectively injecting the at least one chemical into the production fluid using a subsea pump. Because Headworth clearly does not show such an arrangement, claims 1, 30 and 36 and all claims depending therefrom are allowable over Headworth and such action is hereby requested.

Applicant further directs the Examiner's attention to the fact that claim 35 as originally presented recited in part a subsea chemical injection unit having a pump for injecting the at least one chemical into the production fluid. A subsea chemical injection unit with a pump is not a new grounds for allowance, but has been a grounds for allowance that has been consistently presented by the Applicant. Thus, the present amendment to the claims with the subsea pump recitation and supporting arguments are believed to be appropriate for the present reply to the Final Office Action.

CONCLUSION

For all the foregoing reasons, Applicant submits that the application is in a condition for allowance. No fee is believed due for this paper. The Commissioner is hereby authorized to charge any additional fees or credit any overpayment to Deposit Account No. 02-0429 (194-26936-US).

Respectfully submitted,

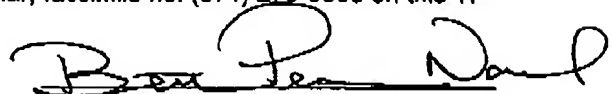
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CERTIFICATE OF FACSIMILE TRANSMISSION

I do hereby certify that this correspondence is being transmitted via facsimile, to the Commissioner for Patents, Examiner Thomas S. Bomar, facsimile no. (571) 273-8300 on this 17th day of March 2006.


Beth Pearson-Naul